



March 20, 2026

Via CalWTRS online Water Rights Data System

Ms. Jane Ling, Program Manager, Petition, Licensing, and Registration Section
State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000

Subject: Petitions for Retroactive Time Extensions (1990-2017):

- 1) Pardee Reservoir Hydropower Water Right Permit 10479 (Application 15201)
- 2) Camanche Reservoir Hydropower Water Right Permit 17378 (Application 25056)

Dear Ms. Ling:

Consistent with our recent discussions with you and your staff regarding the licensing of Hydropower Water Right Permits P10479 (Application 15201) and P17378 (Application 25056), the East Bay Municipal Utility District (EBMUD) hereby files the subject retroactive time extension petitions to cover the authorized use for the period from 1990 through 2017, to encompass the years of maximum use of the hydropower permits since the period of the permits ended in 1990.

As documented in the petitions, other legal users of water will not be impacted by these change petitions because the change petitions do not involve any additional appropriation of water; the hydroelectric rights are non-consumptive; and EBMUD does not propose any new construction or changes in its existing municipal and hydroelectric operations at Pardee and Camanche Reservoirs. In addition, EBMUD will continue to make required releases to meet the obligations to downstream water rights holders.

Per your direction, EBMUD submits the time extension petitions with the associated Environmental Information online through the SWB's new online water rights data system CalWATRS, and will mail the payment for the total filing fee of \$30,000 (\$10,000 for P10479 and \$20,000 for P17378) payable to the SWB and an additional payment of \$850 payable to the Department of Fish and Wildlife (DFW) to cover the relevant fee associated with the P17378 time extension petition. The filing fee to DFW for P10479 was made previously in conjunction with the change petition filed in 2012 and is consistent with Public Resources Code Section 10005(e) for a single project.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'Bradley Ledesma', is written over a light blue horizontal line.

Bradley Ledesma
Manager of Water Resources Planning

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cc: Kathryn Gaffney, SWB, Division of Water Rights, Kathryn.Gaffney@waterboards.ca.gov
Morgan Kilgour, Regional Manager, DFW, Morgan.Kilgour@wildlife.ca.gov
Colin Purdy, Environmental Program Manager, DFW, Colin.Purdy@wildlife.ca.gov
Darren Cordova, MBK Engineers, Cordova@mbkengineers.com



Let's view your Petition application

Application ID

PAR-0000035007

Pending Acceptance

Basic Information

Petition Type

Water right ID

A015201

Water right type

Appropriative

Date approved

2/16/1953

What type of petition are you filing for?

Time Extension

Which of the following changes will be made for this split?

-

Time extenstion details

How many years are you requesting for extension to complete construction and beneficial use of water?

27

Indicate your construction status

Completed

Requested year for full water usage

2017

List the actions taken towards commencing or completing construction

-

List the reasons why construction work was not completed within the time allowed by the permit

-

Estimate the date construction work will begin

-

Estimate date construction work will be completed

-

Project Description

Describe the project that is the subject of the petition. Your description should include present operations under the water right and proposed changes, and any other relevant information to assist Division of Water Rights (Division) staff with understanding your project.

East Bay Municipal Utility District (EBMUD) requests a second time extension for its Pardee Hydropower Water Right Permit 10479 (Application 15201), to retroactively cover from 1990 through 2017. The previous time extension amended the project schedule for construction completion by December 1, 1985 and application of water to beneficial use by December 1, 1990. EBMUD completed construction in 1983 and began applying water to beneficial use shortly thereafter. This petition for extension of time would be retroactive, extending from 1990 to 2017 so as to encompass the year of maximum use under the terms of Permit 10479 for licensing. This retroactive petition for extension of time would not result in any new construction or modification of existing facilities and would continue EBMUD's authorized use of existing hydropower facilities at Pardee and Camanche Reservoirs. Other legal users of water will not be impacted by the petition for extension of time because the hydropower rights are non-consumptive; the petition does not expand EBMUD's existing water rights to divert water from the Mokelumne River; and no changes would result to EBMUD's existing operations. EBMUD routinely releases water from Pardee Reservoir to Camanche Reservoir at various times to assist in meeting state and federally imposed terms and conditions, including (a) releases to meet the SWB's decision in D-1641 requiring minimum fishery flow releases, which release requirements are also mandated by the Federal Energy Regulatory Commission (FERC); (b) releasing cold water from Pardee Reservoir to Camanche Reservoir in summer and fall to be released from Camanche Reservoir for the benefit of the anadromous fishery in the lower Mokelumne River, as required by D-1641 and FERC; and (c) making flood control releases as required by the U.S. Army Corps of Engineers. EBMUD has and will continue to meet all release requirements at Pardee and Camanche Reservoirs. See Attachment 1 for additional details.

 Contact Information



Water Right Contacts

Name	Mailing City	Mailing Zip
EAST BAY MUNICIPAL UTILITY DISTRICT	Oakland	94623
BRADLEY LEDESMA	Oakland	94607

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 Diversion and Use



Diversion of water

Type	Maximum Diversion rate (if applicable)	Year	Flow Rate Units (if applicable)
Direct Diversion	350	1986	Cubic Feet per Second
Surface Storage (On-stream)		1996	
Surface Storage (Off-stream)			
Underground Storage			
Total	350		

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Use of water

Year of Maximum Beneficial Use
2017

Maximum Total Quantity of Water Put to Beneficial Use (in AFY)
163356.0000000

Number of Acres Irrigated
-

Number of Homes or People Served

-

Per Capita Residential Water Use during the Maximum 30-Day Period (in GPM)

-

Extent of Past Use of Water for Any Other Purpose (Volume in Acre-Ft)

2.8

Description of Past Use for Other Purpose

Permit 10479 authorizes incidental domestic use in connection with the powerhouse, operator cottages, caretaker homes, and other operation, maintenance and construction facilities on the project premises.

Estimate in which water year will be fully used

-

Additional Questions

Time extension additional questions

Describe how due diligence has been exercised during the permit development period.

See details in Attachment 1. EBMUD has demonstrated due diligence to develop the rights of its hydropower permits within the larger series of regulatory proceedings affecting the permitting and operations of EBMUD's Pardee and Camanche Reservoirs.

Describe how satisfactory progress will be made if an extension of time is granted.

See details in Attachment 1. This is a retroactive time extension from 1990 to 2017 to encompass the year of maximum use (2017) under the terms of Permit 10479 for licensing.

Describe why failure to comply with previous time requirements has been occasioned by obstacles which could not reasonably be avoided.

See details in Attachment 1. EBMUD has engaged in deliberate, planned, and well-understood coordination efforts of multiple related regulatory processes leading to need for this retroactive time extension request.

Does the permit have a condition requiring implementation of water conservation measures?

No

Water conservation

List the water conservation measures that are in effect within the place of use

-

List the water conservation measures that are feasible within the place of use and the date the measures will be implemented

-

Units

-

Provide the annual amount of water (with the proper unit of measurement) that is being conserved or is feasible to conserve using the conservation measures

-

Environmental Information



Environmental Details

Has any California public agency prepared an environmental document for your project?

No

Select the appropriate box

The proposed changes may be exempt from CEQA.

Provide additional explanation below if necessary

The proposed retroactive petition for extension of time is exempt under CEQA Guidelines §15061(b)(3); §15261; and §15301. EBMUD will file a Notice of Exemption and submit final documentation following completion and submittal of this online petition.

Regional Water Quality Control Board

Not applicable

Staff member name you contacted

Not applicable

First name

-

Last Name

Not applicable

Email

-

Phone

Not applicable

Date of contact

3/17/2026

Department

-

Phone Number

Not applicable

Will your project, during construction or operation, (1) generate waste or wastewater containing sewage, industrial chemicals, metals, or agricultural chemicals, or (2) cause erosion, turbidity or sedimentation?

No

Permit type (if applicable)

Not applicable

Permit status (if applicable)

Not applicable

Will a waste discharge permit be required for the project?

No

Person contacted First name

Colin

Person contacted Last name

Purdy

Date of contact

3/3/2026

Department

Fisheries Environmental Program Manager, North Coast Region

Phone Number

9163582943

Permit type

Not Applicable

Consultation Status

Requested

If your project has the potential to impact any threatened and endangered species or if there are any other known environmental impacts, provide information below.

Not Applicable

Provide CEQA SCH Number (if applicable)

-

Does the project involve any construction or grading activity that has significantly altered or would significantly alter the bed, bank, or riparian habitat of any stream or lake?

No

If necessary, provide additional information below.

Not applicable

RWQBC Permit type

Not applicable



Documents Uploaded



Documents

P10479 Attachment 1 Time Ext Petition_Final_20260320 (00110918-5xC4FEF).pdf	Public Uploads	03/20/2026	Ana U
2026-03-20_JLi Transmittal Letter-Time Extension Petitions.pdf	Public Uploads	03/20/2026	Ana U



Review and Submit



CDFW petition filing fees

Does this petition involve a diversion of water from any waterway where fish reside?

Yes

Is this your first request for an extension of time for an individual permit? And is only for a time extension (i.e., does not involve change in point of diversion, place of use, or purpose of use)?

No

Has CDFW provided you a written determination that the petition is for the primary purpose of benefitting fish and wildlife resources?

No

Are you filing multiple associated petitions for the same appropriation, transfer, extension, or change?

Yes

Provide the petitions

Permit 10479 (A15201) Change Petition filed in December 2012.

CDFW Petition Filing Fee Amount

\$ 850.00

Total due

\$ 850.00

I acknowledge that the above fees and have reviewed the payment instructions

true

SWRCB filing fees

SWRCB Fee Amount

\$ 20000.00

Total due

\$ 20850.00

Sign & submit details

I declare under penalty of perjury that the information in this application and any uploaded attachments are true and correct to the best of my knowledge and belief.

true

Name

Ana Ulloa

Date signed

3/20/2026

Contact Us

916 341 5333

CalWATRS-Help@waterboards.ca.gov

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Permit 10479 Time Extension Petition

Attachment 1

Response to Questions:

Complete Use of Water

The purpose of this retroactive Petition for Extension of Time (petition) is to facilitate the licensing process for East Bay Municipal Utility District's (EBMUD) Pardee Reservoir Hydropower Water Right Permit 10479 (Application 15201). As background, water is diverted and stored in Pardee Reservoir under multiple overlapping rights for multiple purposes. The State Water Resources Control Board (State Water Board) approved Municipal Water Right License 11109 (Application 4228, Permit 2459) in 1926 and Municipal Water Right Permit 10478 (Application 13156) in 1956, which allows EBMUD to divert and store water in Pardee and Camanche Reservoirs for municipal use in its service area. EBMUD also bypasses inflow or releases stored water from Pardee and/or Camanche Reservoirs to meet various downstream release requirements and generates hydropower when making such required releases. As a result, hydropower at Pardee powerhouse is generated with either bypassed inflows or water previously collected to storage under the overlapping municipal and hydropower water rights at Pardee Reservoir.

The State Water Board approved Permit 10479 in 1956 to expand existing hydropower generation at Pardee Dam authorized under Hydropower Water Right License 1388 (Application 4768, Permit 2529) and License 6062 (Application 5128, Permit 3587). In 1981, the State Water Board approved a time extension and amended the original project schedule for Permit 10479 as follows:

- Completion of Construction by December 1, 1985
- Complete Application of the Proposed Use of Water by December 1, 1990

EBMUD completed construction of the project in 1983 and began applying water to beneficial use shortly thereafter. EBMUD subsequently pursued licensing of the Permit; however, the process was delayed by a series of extenuating and unavoidable circumstances including negotiations regarding downstream flow targets as described below. EBMUD has applied additional water to beneficial use from 1990 to 2017 under Permit 10479 as it continued to legally operate its hydropower plant and exercised due diligence to pursue licensing.

The maximum diversion rate (14-day average of 350 cfs) was first demonstrated in water year 1986 and the maximum diversion to storage amount (19,600 AF) was demonstrated in water year 1996. The maximum annual total beneficial use (163,356 AF) was demonstrated

in water year 2017 and the maximum total appropriation (171,314 AF) was demonstrated in water year 2011. EBMUD is requesting a retroactive time extension for Permit 10479 through September 30, 2017 to include these diversion and use quantities.

EBMUD has engaged in deliberate, planned, and well-understood coordination efforts of multiple related regulatory processes leading to the current time extension petition request for Permit 10479.

In 1995, the State Water Board agreed to postpone a scheduled licensing inspection to allow EBMUD to complete negotiations with downstream entities and resource agencies regarding fishery flows. In 1998, the Joint Settlement Agreement (JSA) was reached between EBMUD, the US Fish and Wildlife Service and the California Department of Fish and Game (now Department of Fish and Wildlife). The JSA includes a series of flow, non-flow, and other measures designed to protect and enhance the anadromous fishery and ecosystem of the lower Mokelumne River. The Federal Energy Regulatory Commission (FERC) also issued an Order Approving Settlement Agreement and Amending License on November 27, 1998, amending EBMUD's FERC License for the Lower Mokelumne Hydroelectric Project (FERC Project No. 2916) by requiring the JSA measures. Additionally in 2000, the State Water Board incorporated the flow provisions of the JSA into EBMUD's Mokelumne River municipal water right Permit 10478 and License 11109 through State Water Board Decision 1641 (D-1641). By that action, the State Water Board replaced the previous fishery flows that were required under a 1961 Agreement between EBMUD and CDFW with the 1998 JSA flows in EBMUD's water rights. EBMUD continues to make fishery releases to the lower Mokelumne River consistent with the JSA and D-1641.

In April 2000, the State Water Board recommended that EBMUD delay the licensing request for hydropower water right Permit 10479 and also for its hydropower water right Permit 17378 (Application 25056) at Camanche Reservoir, until it requested a license for its municipal water right Permit 10478, to address both consumptive use and hydropower generation aspects of the Project simultaneously. In November 2000, EBMUD filed a petition for time extension for its municipal Permit 10478.

On July 29, 2008, EBMUD requested a licensing inspection with the State Water Board regarding Hydropower Permit 10479 and Permit 17378, noting that EBMUD had requested a time extension for its municipal Permit 10478 in November 2000.

In 2012, after the State Water Board completed the inspection of EBMUD's project facilities and operations, EBMUD filed separate change petitions to confirm Camanche Dam as a point of redirection and Camanche Powerhouse as a place of use under three hydropower rights at Pardee Reservoir (License 1388, License 6062, and Permit 10479). These change

petitions are summarized in EBMUD's municipal Permit 10478 Time Extension Project Draft Environmental Impact Report, completed in September 2013.

Later in 2012, the State Water Board and EBMUD agreed to prioritize the petition for time extension for municipal Permit 10478 ahead of further processing petitions or licensing the two hydropower permits. In 2016, the State Water Board approved the municipal petition for time extension and change petitions, issuing Amended Permit 10478.

In 2017, due to other higher priority projects arising at the time, EBMUD and the State Water Board agreed to postpone the licensing process for Hydropower Permit 10479 and Hydropower Permit 17378. In 2023, EBMUD and SWRCB agreed to reinstate work to complete the licensing process for both Permit 10479 and Permit 17378. In May 2025, EBMUD received State Water Board's approval of the water accounting procedures for the hydropower change petitions (Permit 10479 and Permit 17378) – the final licensing quantities of water beneficially used under Hydropower Permit 10479 reflects this accounting.

From the resulting sequence of events, EBMUD has demonstrated due diligence to develop the rights of its hydropower permits within the larger series of regulatory proceedings affecting the permitting and operations of EBMUD's Pardee and Camanche Reservoirs.

Approval of this retroactive time extension will not cause any environmental impacts or injure other legal water users or other beneficial uses because the hydropower use is non-consumptive and the water is released back to the Mokelumne River as hydropower is generated; EBMUD will continue its existing operations to meet all release requirements at Pardee and Camanche Reservoirs; and approval of the petition will not expand EBMUD's existing water rights to divert from the Mokelumne River, either directly, or to storage. EBMUD's direct diversion of water for hydropower purposes results in a bypass of inflow through generation facilities and does not change the volume, rate, or timing of the available flows downstream. Furthermore, the diversion to storage season for Hydropower Permit 10479 overlaps with the storage seasons for Municipal License 11109 and Municipal Permit 10478. All water collected to storage in Pardee Reservoir under Hydropower Permit 10479 is also collected for municipal use under License 11109 and Permit 10478. As a result, approval of this petition does not enlarge or affect the existing authorized rate of direct diversion or existing authorized quantity for collection to storage under Permit 10479, nor the timing of such diversions. Accordingly, the requested retroactive time extension for Hydropower Permit 10479 will not result in injury to any downstream users or beneficial uses.

Approximate Amount Spent on Project

EBMUD spent approximately \$9.5 million to complete the construction of the hydroelectric project by 1983. Since that time, EBMUD continues to fund improvements on a periodic basis to maintain and improve the reliability of project facilities necessary to apply water to beneficial use under Permit 10479. Between fiscal years 2021 through 2025, EBMUD expended approximately \$500,000 in total to maintain the hydropower facilities at Pardee Powerhouse.